

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DR. KAROLINA MARCINIAK-DOMINGUES
GONCALVES AGRA and MR. PEDRO
MARCINIAK-DOMINGUES GONCALVES AGRA,

Plaintiffs,

v.

CENTER FOR BRAINS, MINDS AND MACHINES
AT MASSACHUSETTS INSTITUTE OF
TECHNOLOGY, *et al.*,

Defendants.

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) Case No. 1:22-cv-10959 (ALC)
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) **ORAL ARGUMENT REQUESTED**
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**DEFENDANTS' NOTICE OF MOTION TO DISMISS PLAINTIFFS' FIRST
AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL**

PLEASE TAKE NOTICE that upon the accompanying Joint Memorandum of Law in Support of Defendants' Consolidated Motion to Dismiss the Amended Complaint (the "Complaint" (Dkt. 65)), and upon all prior papers and proceedings herein, Defendants Massachusetts Institute of Technology ("MIT"), President and Fellows of Harvard College ("Harvard"), and The Rockefeller University ("RU") (collectively, "Defendants") will jointly move this Court, before the Honorable Andrew L. Carter, Jr., United States District Judge, in the United States District Court for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007 on a date and time to be determined by the Court, for an Order, pursuant to Rules 8 and 12 of the Federal Rules of Civil Procedure, dismissing Count One (violations of the Trafficking Victims Protection Act), Count Ten (conspiracy to interfere with civil rights under 42 U.S.C. § 1985(2)-(3)), Count Eleven (violations of the Racketeer Influenced and Corruption Organization Act), and Count Fourteen

(loss of consortium) of the Amended Complaint with prejudice, and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE NOTICE that pursuant to the Court's Order of November 13, 2023 (Dkt. 71), Plaintiffs' opposition, if any, should be filed and served on Defendants on or before January 17, 2024, and Defendants' reply papers should be filed and served on Plaintiffs on or before January 31, 2024.

Dated: New York, New York
December 15, 2023

Respectfully submitted,

/s/ Jennifer L. Chunias

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Attorneys for President and Fellows of Harvard
College

CERTIFICATE OF SERVICE

I, Jennifer L. Chunias, hereby certify that a copy of the foregoing Joint Memorandum of Law in Support of Defendants' Consolidated Motion to Dismiss the Amended Complaint, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on December 15, 2023.

Dated: December 15, 2023

/s/ Jennifer L. Chunias